

THE LAW OFFICE OF

**ELISA HYMAN, P.C.**

May 13, 2022

**VIA ECF**

The Honorable Robert W. Lehrburger  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**USDC SDNY**  
**DOCUMENT**  
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**DATE FILED:** 5/13/2022

Re: M.W. et al., v. New York City Department of Education, et al.,  
1:19-cv-00779 (SHS) (RWL)

Dear Magistrate Judge Lehrburger:

I represent the Plaintiffs in the above-referenced action and am writing jointly with Defendants' counsel concerning the parties' Case Management Plan due today in preparation for the upcoming conference before Your Honor scheduled for May 20, 2022.

We are seeking an extension of time to file the request until May 18, 2022.<sup>1</sup> During the course of the past two weeks, the parties have been in discussion about the best way to proceed with this case given its scope, and about potentially building in a process for trying to settle and/or resolve the numerous cases, including claims that can be dismissed without prejudice.

Further, we are seeking permission to file a detailed joint letter rather than use the Court's Case Management Form. The reason for this is that we may need to propose different schedules and/or procedures for moving forward with both settlement and discovery, while also having points of agreement.

We apologize for the timing of the request. We are not seeking an extension of time for the conference.

Thank you for Your Honor's consideration of this request.

SO ORDERED:

5/13/2022

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

Sincerely,

/s/

Elissa Hyman, Esq.  
*Counsel for the Plaintiffs*

Cc: Copatrick Thomas, Esq.  
*Counsel for the Defendants*

<sup>1</sup> As the Court is aware, Plaintiffs' counsel has a large deadline in the M.G. Class action on Monday and the parties here will need more time to discuss a plan for moving this case forward.

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